

## REMARKS

In accordance with the foregoing, claims 1-3 and 5 are amended, and claims 14-18 are added. No new matter is being presented, and approval and entry are respectfully requested. Claims 1-5 and 14-18 are pending and under consideration. Reconsideration is respectfully requested.

### REJECTION UNDER 35 U.S.C. §112:

Claim 5 was rejected under 35 U.S.C. §112, second paragraph, relative to the term "etching factor." The claim is amended to clarify the intended meaning of the recited term. The claim amendment is fully supported by the originally filed specification, for example, paragraph [0113] of the publication of the current application.

### REJECTION UNDER 35 U.S.C. §103:

Claims 1-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over Japanese Patent No. 53-77848 (hereinafter "848") or JP 2000-345373.

Reference 848 discloses a cavity being formed by first etching, and then a second etching being conducted using the cavity. In reference 848, after a first etching is conducted using a photoresist as a mask, residue of the photoresist is used again as a mask for the second etching. Accordingly, there are precise dimensional restrictions. Unlike the claimed products of the subject application, the form and size of holes which are used for second etching are difficult to control. Thus, when using the method described in reference 848 it is difficult to produce a metal photoetching product which has the specific combination of a large cavity and a small cavity as claimed.

Furthermore, conducting a third etching seems difficult in 848 from a practical standpoint in terms of durability of a photoresist, since a photoresist film has been used for both the first etching and the second etching. Reference 848 does not teach or suggest more than three or more etchings. The metal photoetching product disclosed in claims 1 to 5 cannot be produced using the method disclosed in 848. Particularly, cavities having a high aspect ratio as those disclosed in claims 1 - 3, 5 and 17 of the present invention cannot be achieved by 848.

JP-A-2000-345373 (hereinafter, referred to as 373) discloses a method wherein etching is conducted by both upper and lower surfaces of a metal substrate. Etching is conducted twice

in 373. However, reference 373 does not teach or suggest that the method of 848 can conduct three or more etchings. The method disclosed in 373 cannot provide a metal product which included a cavity having a high aspect ratio. No cavity which has an etching factor of 2.6 or more can be produced by 373.

Specifically, claim 1 patentably distinguishes over the cited prior art at least by reciting,

**CONCLUSION:**

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: Feb. 15, 2008

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